



January 4, 2018

Donald J. Trump
1600 Pennsylvania Avenue NW
Washington, DC 20500

Dear Mr. President:

The National High School Rodeo Association (NHSRA) strongly supports the efforts being made for Total Repeal of the Rule on Electronic Logging Devices (ELD). Following is a summary of how this regulation is adversely affecting our membership and organization.

The NHSRA is the largest Western Lifestyle Youth association in the world. Established by a High School Superintendent in 1949, our membership driven organization currently has over 12,000 members. Those members and their families travel throughout the United States, Canada, Australia and Mexico to attend over 1,800 sanctioned rodeos per year. Over 90% of those rodeos take place in the United States. Members of the NHSRA which is comprised of students 6th grade through 12th grade, are required to maintain above average grade point averages and are expected to be excellent community advocates as they compete for college scholarships and awards such as saddles and buckles. Between both the Junior High and High School Divisions, 19 out of 23 of our rodeo events require our members to travel with horses.

NHSRA is concerned that the ELD mandate has already and will continue to have negative effects on our membership. Our youth members typically travel with their parents on average 4 hours to compete in a weekend High School Rodeo event. Families typically travel in a full size pickup truck hauling a "Living Quarters Horse/Livestock Trailer" that has room for them to sleep along with space to haul their horses. Since these youth members are competing for scholarship dollars and according to the law implemented, they are now considered to be in "furtherance of a commercial enterprise". With the new law they not only have to obtain a Department of Transportation "DOT" number and a Commercial Driver's License "CDL" in order to travel to these events which are seldom held near their homes. Since a majority of our membership compete in two or more rodeo events each month they will fall outside the 8 days of service rule and be required to install ELD devices into their personal trucks in order to abide by the laws written into this regulation.

The NHSRA does not believe this law was implemented with the recreational horse owner in mind. The ELD do not allow a way to differentiate between travel to the event, going to get grocery supplies once they are set up onsite at a rodeo or hauling a load of freight down the interstate related to commercial

enterprise. Not only are the laws confusing for the casual horse owner who is not a commercial driver but these owners including our members, will run into hours of Service issues. Below is an example of a typical day at a rodeo:

Once onsite at a rodeo it is not unusual for a family to wake up at 5 am to feed and water their horses, then go to breakfast in their pickup truck returning to the event complex for a 9am rodeo start time. The NHSRA student member will then compete in their event(s) during the rodeo which can last between 1 to 3 hours. The time they are actually competing in the arena will last anywhere from a few seconds to a maximum of two and half minutes per event they compete in. The rest of the day will consist of catching up on errands, visiting with friends, eating lunch and returning to the arena that afternoon/evening for the same competition cycle. By the time they finish competition in the arena feed and take care of their horses for the night, often times they will then want to eat dinner around 8pm.

With the new laws in place they however, would not be able to leave the rodeo grounds for any reason, including eating dinner, because they went to breakfast at 6am since the ELD is in place, the ELD would reflect a full day of work has taken place. This family would now be considered to be over the hours they are allowed to "work" and therefore, unable to enjoy a dinner that would require them to drive again. This is just one example of how implementation of the ELD and HOS regulations will impact our members in a negative way.

The NHSRA is also very concerned about how ELDs could impact biosecurity issues for the recreational horse owner. When an owner transports horses, the longer they remain on trailer the more detrimental it is to their welfare and safety. In our industry, guidelines mandate that drivers avoid stops while hauling livestock, especially in warmer climates. HOS rules mandating our families to stop for 10 hours upon reaching their hours worked limit when traveling to rodeos, that are potentially several states away from their homes, will require them to find safe and secure accommodations to unload the horse(s). These places are not as common as hotels and truck stops. Once a location is found not only does offloading/reloading and comingling of horses by families at unknown locations cause significant safety and biosecurity risk for the horse owner but it causes risk to the whole equine industry. These kind of stops foster conditions that enable the spread contagious equine diseases. When a family is allowed to travel directly to the location of the rodeo, they know they will be arriving to a facility that is clean and has biosecurity plans in place to reduce the risk to their horse.

In conclusion, the NHSRA supports efforts for a **Total Repeal** of the laws put into place. It is clear that these laws are hurting our youth members and their families. In addition to the impact to the members of our association, the entire equine industry is seeing a negative impact.

Sincerely,



Austin White

NHSRA VP Marketing